

**UNITED STATES DISTRICT COURT
DISTRICT OF MASSACHUSETTS**

IN RE: NEW ENGLAND COMPOUNDING
PHARMACY, INC. PRODUCTS LIABILITY
LITIGATION

MDL No. 2419
Master Dkt.: 1:13-md-02419-FDS

THIS DOCUMENT RELATES TO:

All Actions

**PLAINTIFFS' MOTION FOR ENTRY OF
STIPULATED PROTECTIVE ORDER
OF CONFIDENTIALITY**

NOW COME Plaintiffs, through the Plaintiffs' Steering Committee ("PSC"), to move this Court for entry of a stipulated protective order of confidentiality to protect the information designated confidential.

The PSC consulted with the Chapter 11 Trustee, the Official Creditors Committee ("OCC") and their counsel, counsel for New England Compounding Pharmacy, Inc. d/b/a New England Compounding Center ("NECC"), Ameridose, LLC, Medical Sales Management, Inc., Doug Conigliaro, Carla Conigliaro, Barry Cadden, Lisa Conigliaro Cadden, Glenn Chin, (collectively, the "Affiliated Defendants") and understand that they assent and join in the entry of the proposed order.

The PSC sent the proposed order in substantially final form to all other defense counsel for their comments on Wednesday, June 26, 2013.¹ We also shared earlier drafts with other defense counsel. The PSC has not received any objections to the attached proposed Stipulated

¹ The only change made to the proposed order since it was circulated to the unaffiliated defendants addressed the procedural mechanism for filing motions to seal in the District of Massachusetts.

Protective Order of Confidentiality from the unaffiliated defendants (or anyone else) as of the time of this filing.

WHEREFORE, this motion should be granted.

Dated: July 2, 2013

Respectfully Submitted,

/s/ *Kristen Johnson Parker*

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Plaintiffs' Steering Committee

CERTIFICATE OF SERVICE

I, Kristen Johnson Parker, hereby certify that I caused a copy of the foregoing Motion for Entry of Stipulated Protective Order of Confidentiality and proposed stipulated protective order of confidentiality to be filed electronically via the Court's electronic filing system. Those attorneys who are registered with the Court's electronic filing system may access these filings through the Court's system, and notice of these filings will be sent to these parties by operation of the Court's electronic filing system.

Dated: July 2, 2013

/s/ Kristen Johnson Parker
Kristen Johnson Parker, BBO # 667261